

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

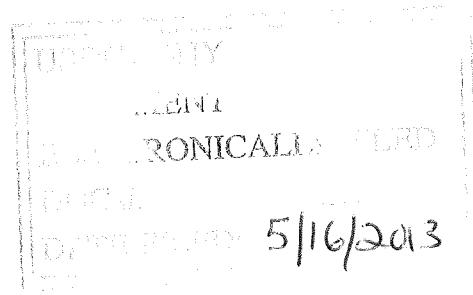
THE FEDERAL HOUSING FINANCE
AGENCY, AS CONSERVATOR FOR THE
FEDERAL NATIONAL MORTGAGE
ASSOCIATION AND THE FEDERAL
HOME LOAN MORTGAGE
CORPORATION,

Plaintiff,

v.

JPMORGAN CHASE & CO., et al.,

Defendants.



Case No. 11-CIV-6188 (DLC)

**STIPULATION AND ~~PROPOSED~~ ORDER REGARDING THE DEADLINE FOR
STIPULATING TO LOAN FILES AND APPLICABLE GUIDELINES**

WHEREAS, the Court entered the Expert Scheduling Order dated November 26, 2012 (the "ESO") ordering Plaintiff The Federal Housing Finance Agency ("FHFA") and Defendants JPMorgan Chase & Co., JPMorgan Chase Bank, N.A., J.P. Morgan Mortgage Acquisition Corporation, J.P. Morgan Securities LLC, J.P. Morgan Acceptance Corporation I, Bear Stearns & Co., Inc., EMC Mortgage LLC, Structured Asset Mortgage Investments II Inc., Bear Stearns Asset Backed Securities I LLC, WaMu Asset Acceptance Corporation, WaMu Capital Corporation, Washington Mutual Mortgage Securities Corporation, Long Beach Securities Corporation (collectively, "JPMorgan," and with FHFA, the "Parties") to work together to identify and stipulate to all documents that comprise the loan origination files for the Sample Loans¹ and all underwriting guidelines applicable to such loans;

¹ Unless otherwise defined herein, any capitalized terms have the same meaning as ascribed to it in the ESO and Stipulation and Order Regarding the Disclosure of Findings, Rebuttal Findings, and

WHEREAS, the Parties have received and continue to receive third-party productions of loan file documents in response to subpoenas issued by JPMorgan and FHFA that the Parties believe comprise the loan origination files for certain of the Sample Loans;

WHEREAS, the Parties continue to engage in the meet-and-confer process in an attempt to identify Loan Files pursuant to the ESO; and

WHEREAS, the Parties agree to continue to review and pursue productions from third-parties that the Parties believe contain loan file documents applicable to the Sample Loans prior to FHFA making the election to replace or retain Sample Loans for those Random Samples;

IT IS NOW STIPULATED AND AGREED BY THE PARTIES THAT:

IT IS ORDERED that FHFA shall be given until May 31, 2013 to make the election to replace or retain Sample Loans in the Securitizations listed in Exhibit I to this Stipulation and Order, pursuant to paragraph 4 of the ESO and paragraph 2 of the Stipulation and Order Regarding the Disclosure of Findings, Rebuttal Findings, and Alternate Samples in the Absence of Stipulations as to Loan Files and Applicable Guidelines entered by the Court on April 3, 2013.

So ordered.

*James G. Ke
May 14, 2013*

Date: May 15, 2013
New York, New York

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Attorneys for Defendants

IT IS SO ORDERED:

By: _____
The Honorable Denise L. Cote, U.S.D.J.

Date: _____

Exhibit 1

AHM 2005-1
AHM 2005-4
BALTA 2005-10
BALTA 2006-4
CBASS 2006-CB2
CBASS 2006-CB7
JPMAC 2006-CW2
LUM 2006-3
PCHLT 2005-4
SACO 2007-1
SACO 2007-2